

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	
)	
Plaintiff,)	C.A. No. _____
)	
v.)	JURY TRIAL DEMANDED
)	
GROUPON, INC.)	
)	
Defendant.)	

PLAINTIFF IBM'S RULE 7.1 DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Plaintiff International Business Machines Corporation ("IBM"), by and through its undersigned counsel, states that it does not have any parent corporation, and that no publicly-held corporation owns 10 percent or more of its stock.

Respectfully submitted,

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